

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

---

ESTATE OF DANTE WILSON,  
by its Special Administrator,  
Judy Wilson

**AMENDED COMPLAINT**  
Case No. 17 CV 737

Plaintiff,

and

KE-YON HANDLEY, DANTE WILSON, JR.,  
DANTECIA WILSON, KEJUAN HILL,  
NATEISHA SMITH AND SASHA REED,

Plaintiff-Intervenors

v.

ADVANCED CORRECTIONAL HEALTHCARE, INC., and  
KIM A. BEEDE, individually

Defendants.

---

**PLAINTIFF-INTERVENORS' AMENDED COMPLAINT IN INTERVENTION**

---

Plaintiff-Intervenors, through their undersigned attorneys, and as for a cause of action against the above-named Defendants, state the following:

INTRODUCTION

1. This is a wrongful death action brought pursuant to Wis. Stat. § 895.04, by the descendants of Dante Wilson. Dante Wilson died as a result of the defendants' deliberate indifference to and reckless neglect of a known serious medical need.

2. Judy Wilson, the Special Administrator of the Estate of Dante Wilson, filed suit against the above-named defendants on September 25, 2017. Dkt. 1.

JURISDICTION

3. This action originally arose under 42 U.S.C. § 1983, via the complaint filed by Special Administrator Judy Wilson, on behalf of the Estate of Dante Wilson. This Court has supplemental jurisdiction over Plaintiff-Intervenors' claims pursuant to 28 U.S.C. § 1367.

PLAINTIFF-INTERVENOR PARTIES

4. Plaintiff-Intervenor Ke-yon Handley is a child/descendant of Dante Wilson.
5. Plaintiff-Intervenor Dante Wilson, Jr. is a child/descendant of Dante Wilson.
6. Plaintiff-Intervenor Dantecia Wilson is a child/descendant of Dante Wilson.
7. Plaintiff-Intervenor Kejuan Hill is a child/descendant of Dante Wilson.
8. Plaintiff-Intervenor Nateisha Smith is a child/descendant of Dante Wilson.
9. Plaintiff-Intervenor Sasha Reed is a child/descendant of Dante Wilson.

STATEMENT OF FACTS

10. Plaintiff-Intervenors join in, and incorporate by reference, all factual allegations made in the original complaint, filed by Special Administrator Judy Wilson.

STATEMENT OF CLAIM – WRONGFUL DEATH

11. Wisconsin Statute § 895.04 affords the Plaintiff-Intervenors the right to bring claims for the wrongful death of their father, Dante Wilson.

12. The operative facts of Dante Wilson's death, as set forth by the complaint of Special Administrator Judy Wilson, and incorporated herein by reference, demonstrate that Defendants conduct was a substantial factor in, and caused, Mr. Wilson's death.

13. For the conduct as alleged in the complaint of Special Administrator Judy Wilson, and incorporated herein by reference, under Wis. Stat. § 895.04, Defendants are liable to Plaintiff-Intervenors for causing the wrongful death of their father, Dante Wilson.

PRAYER FOR RELIEF

**WHEREFORE**, Plaintiff-Intervenors respectfully demand a jury trial and prays that this court:

1. Enter judgment for Plaintiff-Intervenors, and against each defendant, jointly and severally, awarding compensatory and punitive damages against each defendant.
2. Award such other relief as may be just and equitable.

Dated this 8<sup>th</sup> day of August, 2018.

**GINGRAS CATES & WACHS LLP**

Attorneys for Intervenor-Plaintiffs

s/ Scott B. Thompson

Paul A. Kinne

State Bar Number: 1021493

Scott B. Thompson

State Bar Number: 1098161

1850 Excelsior Drive  
Madison, WI 53717  
Phone: (608) 833-2632  
Fax: (608) 833-2874  
[kinne@gcwlawyer.com](mailto:kinne@gcwlawyer.com)  
[thompson@gcwlawyers.com](mailto:thompson@gcwlawyers.com)